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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
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Case No.: 5:20-cv-03664-LHK-SVK

**DECLARATION OF ALEXANDER P.
 FRAWLEY IN SUPPORT OF
 ADMINISTRATIVE MOTION TO SEAL
 PORTIONS OF PLAINTIFFS'
 OBJECTIONS TO SPECIAL MASTER'S
 REPORT (DKT. 299)**

The Honorable Susan van Keulen
 Date: November 4, 2021
 Time: 10:00 a.m.
 Courtroom 6 - 4th Floor

DECLARATION OF ALEXANDER P. FRAWLEY

I, Alexander P. Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 97). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5(e), I submit this Declaration in Support of Plaintiffs' Administrative Motion to Seal Portions of Plaintiffs' Objections to the Special Master's Report and Orders on Referred Discovery Issues (Dkt. 299) ("Plaintiffs' Objections"). Plaintiffs' Objections reference material that Google LLC ("Google") has designated as "Confidential" and "Highly Confidential – Attorneys' Eyes Only" under the parties' Protective Order (Dkt No. 81). Plaintiffs' [Proposed] Order Regarding Plaintiffs' Objections likewise references material that Google has designated as "Confidential" and "Highly Confidential – Attorneys' Eyes Only." And Exhibits A through E to Plaintiffs' Objections are documents that Google has designated as "Confidential" and "Highly Confidential – Attorneys' Eyes Only."

3. Plaintiffs respectfully request that the Court seal the redacted portions of Plaintiffs' Objections and Plaintiffs' [Proposed] Order, as well as Exhibits A through E to Plaintiffs' Objections in their entirety. Copies of the foregoing papers are attached to Plaintiffs' Administrative Motion to Seal.

4. Pursuant to Civil Local Rule 79-5(e)(1), Google, as the designating party, must file a declaration within 4 days establishing that all of the designated material is sealable.

5. I personally served a copy of this Declaration on Google's counsel of record by email on October 27, 2021. A Proof of Service is concurrently filed herewith.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of October, 2021, at New York, New York.

/s/ Alexander P. Frawley